



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St, Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

June 13, 2012

Mr. Paul Bradford, Supervisor,
Kootenai National Forest
1101 U.S. Highway 2 West
Libby, Montana 59923

Re: CEQ # 20120151; EPA Comments on Sparring
Bulls Project FEIS and ROD

Dear Mr. Bradford:

The U.S. Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Kootenai National Forest's Sparring Bulls Project in accordance with EPA responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations, 40 CFR Parts 1500-1508.

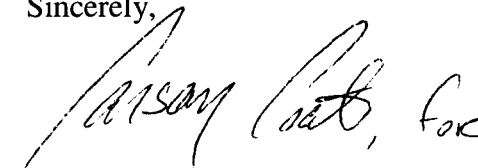
The EPA appreciates receipt of the responses to EPA's DEIS comments that were included in Chapter 5 of the FEIS. The Kootenai National Forest has selected Alternative B-Modified as the preferred alternative, involving 492 acres of stand improvement harvest and 543 acres of regeneration harvest (with approximately 61 percent harvested by tractor, 36 percent skyline yarded, and 17 percent of the total harvest occurring in winter to minimize soil compaction, weed spread, and open road density impacts in Bear Management Unit 1). Approximately 4 miles of road commissioning and 34 miles of road storage are also included to reduce sediment delivery to streams, and less than 1 mile of temporary new road would be constructed to access harvest units, while 56 miles of existing haul roads would be improved. Prescribed burning is proposed on 3,800 acres.

We appreciate the inclusion of the road related watershed improvement activities in the preferred alternative. As you know, portions of Stanley, Keeler, Dry, and Lake Creeks are listed as water quality impaired by the State of Montana having only partial support of aquatic life and cold water fisheries beneficial uses, and the U.S. Fish and Wildlife Service has designated Bull Lake, Lake Creek, Keeler Creek, and North Fork Keeler Creek as critical habitat for the threatened bull trout. It is important, therefore, that watershed concerns are addressed as projects to improve management of forest vegetation and fuel loads are planned and carried out.

We also appreciate the modifications made to the preferred alternative to reduce impacts to soils and wildlife (e.g., dropping Unit 30 to avoid creating an additional large opening; dropping Unit 15 to maintain BMU 1 Core standards, both of which also reduce the need to open roads for timber access, and reduce detrimental effects to wildlife security; reducing tractor timber harvest and increasing winter harvest to reduce detrimental soil effects; and dropping Unit 14A to avoid disturbance to an active goshawk nest).

Thank you for providing the opportunity to participate in the NEPA process and review the Sparring Bulls EIS. If you have any questions regarding our input please contact Mr. Stephen Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie A. DalSoglio".

Julie A. DalSoglio
Director
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA, 8EPR-N, Denver
Robert Ray, MDEQ, Helena
Mike Herrin, District Ranger, Troy Ranger District